

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

LULAC TEXAS, et al.,

Plaintiffs,

v.

JOSE ESPARZA, in his official capacity as the
Texas Deputy Secretary of State, et al.,

Civil Action No: 1:21-cv-00786-XR

Defendants.

MOTION FOR ADMISSION *PRO HAC VICE*

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now **Zack Goldberg**, applicant herein, and moves this Court to grant admission to the United States District Court for the Western District of Texas pro hac vice to represent **Lisa Wise, in her official capacity as the El Paso County Elections Administrator** in this case, and would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm **States United Democracy Center**, with address at:

86 Fleet Place, No. 6T
Brooklyn, NY 11201
Telephone: 917-656-6234
Email: zack@statesuniteddemocracy.org

2. Since **March 19, 2018**, Applicant has been and presently is a member of and in good standing with the Bar of the State of **New York**.

Applicant's bar license number is **5579644**.

3. Applicant has been admitted to practice before the following courts:

Court:	Admission Date:
New York	3/19/2018
U.S. District Court, Southern District of New York	3/3/2020
U.S. District Court, Western District of Michigan	10/14/2020
U.S. District Court, Eastern District of Michigan	6/8/2020

4. Applicant is presently a member in good standing of the bars of the courts listed above, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):

N/A

5. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided below:

N/A

6. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):

N/A

7. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

8. Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

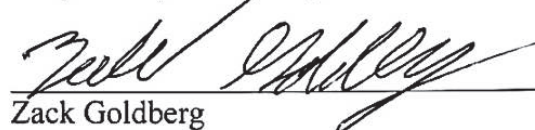
Ranjana Natarajan
 1801 E 51st St., Suite 365, No. 334
 Austin, TX 78723
 Telephone: (323) 422-8578

pro hac vice fee in compliance with Local Court Rule AT-1(f)(2) [checks made payable to: Clerk, U.S. District Court].

10. Should the Court grant applicant's motion, Applicant shall register as a filing user within 10 days of this order, pursuant to Administrative Policies and Procedures for Electronic Filing in Civil and Criminal Cases in the Western District of Texas.

Wherefore, Applicant prays that this Court enter an order permitting the admission of **Zack Goldberg** to the Western District of Texas pro hac vice for this case only.

Respectfully submitted,


Zack Goldberg

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 20th day of September, 2021.

/s/ Ranjana Natarajan
Ranjana Natarajan (TX SBN #24071013)

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ORDER

BE IT REMEMBERED on this the _____ day of _____, 20____, there was presented to the Court the Motion for Admission Pro Hac Vice filed by **Zack Goldberg** (“Applicant”), counsel for Lisa Wise, in her official capacity as the El Paso County Elections Administrator and the Court, having reviewed the motion, enters the following order:

IT IS ORDERED that the Motion for Admission Pro Hac Vice is GRANTED, and Applicant may appear on behalf of Lisa Wise, in her official capacity as the El Paso County Elections Administrator in the above case.

IT IS FURTHER ORDERED that Applicant, if Applicant has not already done so, shall, in compliance with Local Court Rule AT-1(f)(2), immediately tender the amount of \$100.00, made payable to: Clerk, U.S. District Court.

IT IS FURTHER ORDERED that Applicant, pursuant to the Administrative Policies and Procedures for Electronic Filing in Civil and Criminal cases in the Western District of Texas, shall register as a filing user within 10 days of the date of this Order.

IT IS FINALLY ORDERED that Applicant's Pro Hac Vice status shall not become effective until Applicant has complied with all provisions of this Order.

SIGNED this the _____ day of _____ 20____.

UNITED STATES DISTRICT JUDGE